## In "D'oost of Comments"

Printed: 04-29-97

By: Howe, Carol

Priority: Normal

Topic: Re: Re: Comments on summary

Sent: 04-28-97

From: rwoodard@goldeneye.water.ca.go

To: Howe, Carol; Carol Howe

Mail\*Link»

Re: Re: Comments on summary

-Balance of studies +an needld

>Date: Fri, 25 Apr 1997 16:33:01 -0700 (PDT) >From: Vic DeVlaming <vicdv@bptcp1.swrcb.ca.gov> >Subject: Re: Re: Comments on summary >To: Bruce Thompson <brucet@sfei.org> >cc: HBailey@evs.wa.com, Gfredlee@aol.com, AWCONSULT@aol.com, Aquasci@aol.com, chrisf@bptcp1.swrcb.ca.gov, bobf@delta.dfg.ca.gov, Bherbold@aol.com, bfinlays@hq.dfg.ca.gov, dmfry@ucdavis.edu, dehinton@ucdavis.edu, jtm@crl.com, jay@sfei.org, lhsmith@usgs.gov, kkuivila@usgs.gov, karent@bptcp1.swrcb.ca.gov, mjsnyder@ucdavis.edu, lwintern@water.ca.gov, lrbrown@usgs.gov, Phyllisfox@aol.com, nsinghasemanon@cdpr.ca.gov, MJUNGINC@aol.com, spies@amarine.com, snluoma@usgs.gov, slanderson@lbl.gov, cdarling@water.ca.gov, wabennett@ucdavis.edu, valc@bptcp1.swrcb.ca.gov, rwoodard@water.ca.gov

>Bruce-

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I strongly disagree with your statement that we are out of hand and the Fred overstated his point. Being in a regulator position I hear and see >every day that we can't take action until the fish float belly up. Why >do we attempt to prevent pollution (if indeed we do) if no actions will >be taken until significant populations declines are validated? There are >several cases of pollution where, in many scientists opinions, there is >enough evidence (not 99 or '100% sure, but 85% or so) for corrective >action. We can never be completely sure about anything. I do agree that >there are other potential pollution problems where there is not enough >information to act on, but, give me a break, we have enough evidence to >take action to reduce the offsite movement of OP pesticides.

>On Fri, 25 Apr 1997, Bruce Thompson wrote:

>> The "bodycount" analogy is out of hand. Fred overstated the concept. In >> other forums, he has used that very arguement, that we must look for >> effects first (so called Evaluation Monitoring): a basic concept, with >> which I agree, that we need to have some evidence of biological effects in

>> order to know what the problems are. We all know that doing that is
>> usually quite subtle (sublethal biomarkers, bioaccumulation, growth rate
>> reductions etc.). Nobody can honestly believe "bodycounts" are necessary.
>> Most of the comments have said essentially, "lets prioritize and proceed
>> sensibly". There is alot of middle ground between what CALFED's draft
proposed and studying the system "to death". To me, the obvious next

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- >> is to work towards an well thought out wat to do that. Overstatement gets >> us nowhere. >> \*\*\*\*\*\*\*\*\* > At 07:32 PM 4/25/97 GMT, Howard Bailey wrote: > >I have to say that i agree 100% with Fred's and Victor's comments. >> >take action on the basis of our best professional judgement with the intent >> >that systems be protected prior to their reaching a level of perturbation >> >from which they cannot regain their old structure. >> > >> >One can argue that there are no vacant niches; once a system has reached >> >new equilibrium, it is very difficult to restore to its old configuration. >> > >> > Awaiting a body count to mount up may give us a higher level of confidence >> >that we are actually doing the right thing but at some point there are >> >bodies left to count and we still won't have the assurance that we have >> >correctly identified the causative mechanism. >> > >> > If we look at the system, we know that flows and exports affect it, there are >> >lethal levels of pesticides seasonally present, and that certain metals >> > (including Se) are also be of concern. There is more than enough to address > >in just in this narrow range of perturbants (i.e., programs to control >> >offsite movement of pesticides, changes in flows through the system to mimic >> >historical patterns, and altering the extent of exports). οf >> >course is that changes in any of these areas affect some user group and the >> >least intrusive course to follow is simply conducting additional studies (no >> >one gets offended and the scientific community continues to get funded). >> >From a people perspective this is a nice approach, but it doesn't do much for >> > the ecosystem.
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- >> >regards,
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